

UNITED STATES DISTRICT COURT

for the

EASTERN District of Virginia
Richmond DivisionMR. JEROME JULIUS & CONSTANCE BROWN -
MARRIOTT RESIDENCE INN SUITE 611 GIBSON
CERTIFICATE OF ASSUMED REGISTRATION 7803736

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.) *SECURE* SECURE* 7600284554
-V- PNC BANKMIF ALEXANDRIA V LLC
MARRIOTT CEO ANTHONY CAPUANO
MG- MILL ROAD LLC
THOMAS H. ANDREWS PARTNERSHIP

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)Case No. ~~1:21-cv-~~ 3:21cv415
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☒ Yes ☐ NoREGISTERED AGENT
CORPORATION SERVICE COMPANY
100 SHOEBOE SLIP 2ND FLOOR
RICHMOND VIRGINIA 23219

COMPLAINT FOR THE CONVERSION OF PROPERTY

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if
needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

US BOUNTY # 1014
CERTIFICATE OF ASSUMED, JEROME JULIUS BROWN
2345 MILL ROAD, SUITE 611 PERMANENT RESIDENCE
ALEXANDRIA
VIRGINIA 22314
703.310.1175 678.575.7710
brittany.alexander@marrriott.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an
individual, a government agency, an organization, or a corporation. For an individual defendant,
include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

ATTN: MR. ROBERT A. INDEGLIA JR
 MHE ALEXANDRIA VIRGINIA LLC
 300 CENTERVILLE ROAD SUITE 300 EAST
 WARWICK
 RHODE ISLAND 02886
 SHANNON. MISTRETTA
 COLC @ MARRIOTT.COM

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

MR. ANTHONY LAPUANO
 CHIEF EXECUTIVE AND PRESIDENT
 10400 FERNWOOD ROAD
 BETHESDA
 MARYLAND 20817
 800 422 0728
 ANTHONY.CAPUANO@MARRIOTT.COM

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

MG-MILL ROAD, LLC
 GRANTOR, AND GRANTEE
 464 SOUTH ULSTER STREET SUITE 1500
 DENVER
 COLORADO 80237

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

THOMAS H. ANDREWS PARTNERSHIP
 GRANTOR, AND GRANTEE
 4157 CHAIN BRIDGE ROAD
 FAIRFAX
 VIRGINIA 22030

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)**1. If the plaintiff is an individual**

The plaintiff, (name) US BOUNTY #1014, JEROME JULIUS BROWN, is a citizen of the State of (name) VIRGINIA, SUCCESSOR,

2. If the plaintiff is a corporation

The plaintiff, (name) US BOUNTY #1014 JEROME JULIUS BROWN, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)**1. If the defendant is an individual**

The defendant, (name) MB - Mill Road, LLC, is a citizen of the State of (name) COLORADO. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) MB - Mill Road, LLC, is incorporated under the laws of the State of (name) COLORADO, and has its principal place of business in the State of (name) COLORADO. Or is incorporated under the laws of (foreign nation) N/A, and has its principal place of business in (name) VIRGINIA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

QUIT CLAIM DEED, RECORDING REQUESTED BY EDWARD SEMONIAN CLERK, CIRCUIT
RECORDED MAIL TO ALEXUS US COURIERS & TITLE SERVICES GRANTEE'S
THIS QUIT CLAIM DEED, EXECUTED ON JAN 4th 2019 GRANTOR M6 MILL ROAD LLC
CASE COMMENTS, BROWN, JEROME V. RESIDENCE INN BY MARRIOTT

III. Statement of Claim

- A. Describe the property that you own that is the subject of this complaint, including its value. \$ 40,545.700

LOT SIZE SQ FT 32511, ZONING CDD #2. YEAR BUILT 2008, CONSTRUCTION EXCELLENT
BUILDING CONDITION EXCELLENT, HVAC WARM AND COOL AIR ZONE, BUILDING TYPE
HOTEL, GROSS BUILDING AREA SQ FT 126.390 DATE OF QUERY JUNE 17, 2021

- B. How and when did you come to own the property?

CERTIFICATE OF ASSUMED, REGISTRATION NO. 780 3736, MELISSA LISED
BENITEZ, NOTARY PUBLIC COMMONWEALTH OF VIRGINIA, ALEXANDRIA CIRCUIT
COURT, ACKNOWLEDGMENT 0523 2019 JEROME JULIUS BROWN OWNER MARRIOTT
RESIDENCE INN AT CARLYLE

- C. How and when did the defendant(s) obtain possession of the property? Describe with particularity the actions the defendant(s) took to convert the property.

SALE DATE 07 21 2006 GRANTOR M6 MILL ROAD LLC
SALE DATE 07 21 2006 GRANTOR M6 CARLYLE HOTEL INC
SALE DATE 07 18 2006 GRANTOR THOMAS H. ANDREWS PARTNERSHIP
SALE DATE 05 24 2006 GRANTOR THOMAS H. ANDREWS PARTNERSHIP

- D. (If the defendant(s) rightfully came into possession of the property): Describe how and when you notified the defendant(s) that the property belonged to you. Describe how and when you demanded that the defendant(s) deliver or return the property, and what response you received from the defendant(s). Attach a copy of any written correspondence with the defendant(s), if such copies exist.

OUTLINED ACKNOWLEDGEMENT OF RECEIPT CAPTION JEROME JULIUS BROWN
SA. V. SMC PRESIDENT RONALD T. FRANK ETAL CASE # 1:18-CV-370
CRIMINAL COMPLAINT UNEXECUTED BY US MARSHAL, BASED ON FACTS
MARRIOTT CREDIT CARD AUTHORIZATION FORM FILED 04 30 2018 TOLD TO
NOTICE AMENDED ONE YEAR STAY, DEFENDANTS ATTY JOHN T. FRANK AMENDED
SUBPOENA CIVIL ACTION 1:21-CV-475 WILL CALL MOTION 1:18-CV-370

IV. Relief

State briefly and precisely what damages ~~relief~~ the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. CLAIMS 7 CASES JUDICIAL DEFAULT ENTITLED SUITE #611.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: JUNE 21TH 2021

Signature of Plaintiff

Printed Name of Plaintiff

MARRIOTT RESIDENCE INN Jerome Julius Brown sr
MARRIOTT RESIDENCE INN JEROME JULIUS BROWN SR

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address